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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN ESPINOSA, individually and as
personal representative of the Estate of decedent
ASA SULLIVAN; A.S., by and through his
Guardian ad Litem, NICOLE GUERRA;

Case No. C 06 04686 JSW

**ADMINISTRATIVE MOTION AND
(PROPOSED) ORDER TO FILE
DOCUMENTS UNDER SEAL**

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,
a municipal corporation; HEATHER FONG, in
her capacity as Chief of Police for the CITY
AND COUNTY OF SAN FRANCISCO; JOHN
KEESOR, individually, and in his capacity as a
police officer for the CITY AND COUNTY OF
SAN FRANCISCO; MICHELLE ALVIS,
individually and in her capacity as a police
officer for the CITY AND COUNTY OF SAN
FRANCISCO; PAUL MORGADO, individually
and in his capacity as a police officer for the
CITY AND COUNTY OF SAN FRANCISCO;
and, San Francisco police officers DOES 1-25,
inclusive,

Honorable Judge Jeffrey S. White

Defendants.

/

MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Local Rules 7-11 and 79-5, Plaintiffs hereby move the Court for an Order to File
Documents Under Seal, including only below-noted specified portions of the Declaration of

1 Benjamin Nisenbaum in support of Plaintiffs' Opposition to Defendants' Motion for Summary
2 Judgment, or Partial Summary Judgement.

3 **V:** Only exhibits D, E, and F to the deposition of Alexander Jason, Exhibit V, consisting of
4 photographs of decedent's body at the shooting scene should be filed under seal. These should be
5 sealed due to the graphic nature of the photographs.

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7 Respectfully submitted,
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9 Dated: July 3, 2008

The Law Offices of John L. Burris

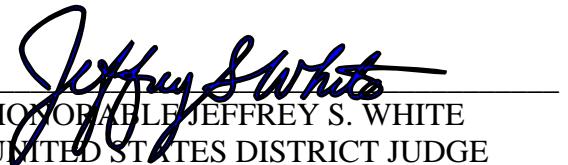
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11 /s/ Benjamin Nisenbaum
12 Ben Nisenbaum
13 Attorney for Plaintiff

14 **(PROPOSED) ORDER**

15 **PURSUANT TO THE TERMS OF THE PROTECTIVE ORDER**, the above-noted
16 portions of the Declaration of Benjamin Nisenbaum in support of Plaintiffs' Opposition to
17 Defendants' Motion for Summary Judgment, or, Partial Summary Judgment, are herewith ordered
18 filed under seal pursuant to Local Rule 79-5.

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20 **IT IS SO ORDERED.**

21 Dated: July 9, 2008

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HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE